

# KLCC (Holdings) Sdn. Bhd.

## Whistleblowing Policy



### Policy Statement

KLCC (Holdings) Sdn. Bhd. ("KLCCH") is committed to the highest standard of integrity, openness and accountability in the conduct of its businesses and operations. It aspires to conduct its affair an ethical, responsible and transparent manner.

Recognising the above-mentioned values, KLCCH provides avenues for all employees of KLCCH and members of the public to disclose any improper conduct within KLCCH.

### Objective of the Policy

This policy is to provide an avenue for all employees of KLCCH and members of the public to disclose any improper conduct in accordance with the procedures as provided for under this policy and to provide protection for employees and members of the public who report such allegations.

### Scope of the Policy

This policy is designed to facilitate employees and members of the public to disclose any improper conduct (misconduct or criminal offence) through internal channel. Such misconduct or criminal offences include the following:

- i. Fraud;
- ii. Bribery;
- iii. Abuse of Power;
- iv. Conflict of Interest;
- v. Theft or embezzlement;
- vi. Misuse of Company's Property;
- vii. Non-Compliance with Procedure

The above list is not exhaustive and includes any act or omissions, which if proven, will constitute an act of misconduct under KLCCG Code of Conduct and Business Ethics (CoBE) or any criminal offence under relevant legislations in force. The given procedures as reflected in the Employee Handbook and CoBE shall be operative based on the purpose and objective of their existence.

**Datuk Sr Mohd. Salem Kailany**

Group Chief Executive Officer

KLCC (Holdings) Sdn. Bhd.

1 November 2024

### Applicability of the Policy

Our policy applies to every employee, director, and officer of KLCCH. Joint venture companies in which KLCCH is not a controlling stakeholder and associate companies of KLCCH are encouraged to adopt this policy whilst our contractors, agents, outsourced workers, and business associates are required to always act consistently with applicable parts of this policy when dealing with, acting on behalf or in the name of KLCCH. This policy also applies to members of the public, where relevant.

### Procedure in Making a Disclosure

All disclosures are to be reported via secured and confidential channel in accordance with the procedures as provided under this policy.

### Protection to Whistleblower

A whistleblower will be accorded with protection of confidentiality of identity, to the extent reasonably practicable. In addition, an employee who whistle blows internally will also be protected against any adverse and detrimental actions for disclosing any improper conduct committed or about to be committed within KLCCH, to the extent reasonably practicable, provided that the disclosure is made in good faith. Such protection is accorded even if the investigation later reveals that the whistleblower is mistaken as to the facts and the rules and procedures involved.

### Anonymous Whistleblower

Any employee or member of the public who wishes to report improper conduct may remain anonymous.

### Notification

When you report a concern, you can expect that your report will be treated seriously, fairly and promptly. You may expect updates during and upon completion of our investigation, unless we take the view that disclosure may impede investigation.